

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036
(212) 223-0400
FAX: (212) 753-0396
www.zeklaw.com

35 MASON STREET
GREENWICH, CT 06830
(203) 622-0900
FAX: (203) 862-9889

BARRY J. GLICKMAN
(212) 826-5327
bglickman@zeklaw.com

103 EISENHOWER PARKWAY
ROSELAND, NJ 07068
(973) 618-9100
FAX: (973) 364-9960

July 10, 2015

BY ECF

Hon. John F. Keenan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007-1312

**Law Offices of Oliver Zhou v. Citibank, N.A., et. al.
Case No.: 15-CV-5266 (JFK)**

Dear Judge Keenan:

We are counsel to defendant Citibank, N.A. We write pursuant to this Court's rules to approve an extension of time by which to respond to plaintiff's complaint to and including July 31, 2015. On or about June 17, 2015 plaintiff served the summons and complaint on Citibank. On July 7, 2015 defendant PNC Bank, N.A. removed this case to this Court. Thus, pursuant to Fed. R. Civ. P. 81(c)(3)(C) Citibank's original time to respond to the complaint expires on July 14, 2015. Prior to removal, during a telephone conversation on June 30, 2015 plaintiff's counsel consented to an extension of Citibank's time to respond to the complaint to July 31, 2015. This is Citibank's first request for such an extension.

We thank the Court for its courtesy.

Respectfully,



Barry J. Glickman

cc: Oliver Zhou, Esq. (by E-mail)
ozhoulaw888@gmail.com